

STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JODY CONCEPCION,
Plaintiff,

THE CITY OF NEW YORK, POLICE OFFICER
ALEXIS FERNANDEZ, "JANE and JOHN DOES"
1-15, and the REPUBLICAN NATIONAL
COMMITTEE,

05 CV 8501 (KMK)
PLAINTIFF'S CROSS
NOTICE OF DEPOSITION
AND PRELIMINARY
REQUESTS FOR
PRODUCTION OF
DOCUMENTS

Defendants.

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PLEASE TAKE NOTICE that pursuant to the October 3, 2005 discovery order in the consolidated "RNC" cases, and to Rule 30 of the Federal Rules of Civil Procedure, plaintiff in the above-captioned matter will take the deposition upon oral examination of the individuals listed below, at the offices of the New York Civil Liberties Union, 125 broad Street, 17th Floor, New York, New York, 10004, on the dates listed below. The depositions shall be before a Notary Public of the State of New York or some other duly authorized person, and shall be recorded by stenographic means:

Deputy Inspector Galati: November 29, 2005
Deputy Chief Terence Monahan: December 1, 2005
Assistant Chief Thomas Purtell: December 5, 2005
Deputy Inspector James Essig: December 20, 2005
Deputy Inspector Gerald Dieckmann: January 10, 2006
Deputy Commissioner John Colgan: January 17, 2006
Chief of Patrol Nicholas Estavillo: January 19, 2006
Chief of Department Joseph Esposito: January 24, 2006
Commissioner Raymond Kelly: January 26, 2006

PLEASE TAKE FURTHER NOTICE that plaintiff's counsel hereby requests, pursuant to Rule 34 of the Federal Rules of Civil Procedure, all documents identifying or referring to the roles and activities of the above-listed deponents during the 2004 Republican National Convention. Plaintiff's counsel also requests all documents concerning NYPD planning for, and response to, demonstration-related activity in or around Union Square at East 16th Street between Union Square East and Irving Place.

Dated: New York, New York
November 22, 2005

LESLIE LEWIS, Esq.

ZELDA STEWART, Esq.

KAREN WOHLFORTH, Esq.

Attorneys for Plaintiff

By: 

KAREN WOHLFORTH, ESQ.

299 Broadway, 17th Floor

New York, New York 10007

(212) 646-2172